

under 35 USC 103(a) as not being patentable over U.S. patent 5,299,655 to Margaritis in view of U.S. patents 629,935 to Sturgis and 2,198,960 to Deck, the Examiner stating that it would not have been unobvious to modify Margaritis to comprise flooring sections secured as claimed to facilitate assembling and removal of same.

The claims have been amended to more clearly define what Applicant regards as the invention. As amended, each of the claims recites that said flooring panels are individually removable from said floor and that the platform may be repeatedly assembled and disassembled. For the reasons provided hereinafter, it is respectfully submitted that each of the claims, as amended, is unobvious over the references of record.

An important objective of the present invention is to provide a working platform below a bridge deck which is quick, easy, and economical to erect and later dismantle, i.e., so that the platform may be repeatedly assembled and disassembled. In order to achieve this objective, in accordance with the present invention, a plurality of cables are secured at their ends to the bridge such as at bridge piers to extend longitudinally along the bridge and at a desired distance below the bridge portion to be worked on. Then, a plurality of flooring panels are laid in side-by-side relation to rest on the cables and are oriented to extend transversely of the cables and are releasably secured thereto. The flooring sections are individually releasable, in accordance with the present invention, to not only allow the platform to be repeatedly assembled and disassembled but to also allow convenient and quick access through the flooring of the platform in emergency situations, such as if a worker becomes seriously ill or injured and needs to be lowered safely to the ground below.

A dilemma addressed by the present invention is how to

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attach the panels to the cables, which run underneath the panels, by workmen positioned on top of previously laid panels, since reaching around the side of a panel would be dangerous as well as difficult. In order that the individual panels may be quickly and easily yet securely attached to the cables, in accordance with the present invention, an opening is provided in the panel which is large enough that an eyelet portion of an attachment member may be passed (translated) therethrough, after which the cable is received in the eyelet, and the member secured to the panel with the eyelet portion drawn taut against the underneath of the panel so that the cable is securely attached to the panel.

Thus, there is provided, in accordance with the present invention, a platform which easily and economically uses the bridge structure itself for support while allowing easy, quick, economical, safe, and repeated erection and dismantling and further allows quick and convenient access through the flooring in emergency situations.

Margaritis discloses a bridge structure to which is attached a workplace support and enclosure wherein a floor is provided by chainlink fencing, illustrated at 54 in Margaritis, supported by spaced longitudinally-extending cables, illustrated at 36 in Margaritis, and with flexible fabric overlying the fencing. The cables are installed below the bridge substructure by attaching opposite ends of each cable to a beam support bearing, illustrated at 18 in Margaritis, by use of cable slings, clevis, and turnbuckles, or to other essentially immovable portions of the bridge substructure. The fencing is attached to the cables by "any suitable clip or fastener", as stated at col. 4, lines 52 and 53, of Margaritis. A tarp overlies the fencing and is affixed to the cables "by rings or clips extending through small openings in the tarp", as stated at col. 4, lines 57 to 62, of Margaritis.

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Margaritis does not disclose or suggest the combination of flooring panels and cables and certainly does not disclose or suggest means for releasably securing flooring panels to cables so that the flooring panels are individually removable from the floor and so that the platform may be repeatedly assembled and disassembled, as provided by the present invention.

Sturgis discloses a suspension bridge wherein flooring planks, illustrated at 35 of Sturgis, are laid upon joist-cables, illustrated at 14 of Sturgis, which are stretched between the shore ends of the bridge and attached to dead-men, illustrated at 12 of Sturgis, which, as illustrated in Fig. 1 of Sturgis, are embedded in the earth. The flooring planks are "united firmly together" by stringers or rails, as illustrated at 36 of Sturgis, which are laid upon and fastened to the flooring planks and by hook-bolts, illustrated at 37 of Sturgis, which pass through the stringers and certain of the planks and have their hooks engaged with the joist-cables. See page 3, lines 24 to 46, of Sturgis.

In a teaching away from the present invention, Sturgis states, at page 3, lines 41 to 47 thereof, that it is not necessary to pass the hook-bolts through each floor plank because the longitudinal stringers and the joist cables bind the floor planks firmly together. Thus, Sturgis teaches, contrary to the present invention, a firmly united floor structure whereby individual floor planks are not releasable from the cables. Accordingly, Sturgis does not teach or suggest flooring panels releasably secured to cables so that the flooring panels are individually removable from the floor and so that the platform may be repeatedly assembled and disassembled, as provided by the present invention, but instead teaches away from the present invention.

Deck discloses a scaffold wherein a hook 22 is passed through a slot 21 in a bar 18 then between the boards of a

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platform 10 and engages base bars 17, then nut 29 is tightened to draw the bar and base bars snugly against the platform.

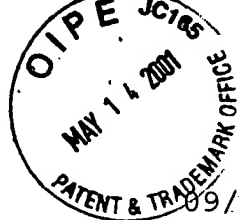
Contrary to the present invention, the platform 10 of Deck is undoubtedly a single unitary structure, and the hooks are passed between spaced boards thereof. Thus, Deck does not disclose a floor comprising a plurality of flooring panels each having an opening therein for passage of a eyelet portion, as provided by the present invention.

Since the Sturgis disclosure is to a permanent structure, one would not look to the teachings thereof for the purposes of improving the scaffolding, a temporary structure, of Margaritis. Therefore, there is no impetus or motivation for combining Sturgis and Margaritis.

Even if Sturgis and Margaritis and Deck were properly combinable, the combination still would not result in the present invention since none of these references discloses or suggests a floor comprising a plurality of flooring panels each having an opening therein for passage of a eyelet portion, as claimed in each of the claims, as amended. Moreover, none of these references teaches or suggests flooring panels for a platform which are individually removable from the floor and that the platform may be repeatedly assembled and disassembled, as also claimed in each of the claims, as amended.

Neither Sturgis or Margaritis or Deck or any other of the references of record, whether taken together or individually, discloses, teaches, or suggests a combination of a bridge and a platform attached to the bridge or a method for supporting persons performing work on a bridge which comprises installing a platform below a deck of the bridge wherein a plurality of cables are extended along the bridge and attached to the bridge, flooring sections are rested side-by-side on the cables, and the flooring sections are releasably secured to the cables so that the flooring

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panels are individually removable from the floor and so that the platform may be repeatedly assembled and disassembled, as claimed in each of claims 15 to 26, as amended, in order that a temporary platform for supporting persons performing work on the bridge may easily and economically use the bridge structure itself for support while providing easy, quick, safe, and economical erection and dismantling repeatedly and to further allow quick and convenient access through the flooring in emergency situations. Therefore, it is respectfully submitted that claims 15 to 26, as amended, are unobvious over the prior art and therefore patentable.

Since it is respectfully submitted that each of the claims, as amended and with the terminal disclaimer submitted herewith, is patentable, it is respectfully submitted that this application is in condition for allowance, and such is respectfully requested.

Respectfully submitted,

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